NEM:MND F. #2024R00803	
UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK	
UNITED STATES OF AMERICA	
- against -	COMPLAINT AND AFFIDAVIT IN SUPPORT OF APPLICATION FOR ARREST WARRANTS
JAVAUGHN HORTON and	
ERIK STEADMAN,	(18 U.S.C. § 113(a)(4))
Defendants.	Case No. 25 MJ 70
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EASTERN DISTRICT OF NEW YORK, SS:

DANIELLE WILLIAMS, being duly sworn, deposes and states that she is a Special Agent with the United States Attorney's Office for the Eastern District of New York, duly appointed according to law and acting as such.

On or about September 5, 2024, within the Eastern District of New York, and within the special maritime and territorial jurisdiction of the United States, namely, the Metropolitan Detention Center in Brooklyn, New York ("MDC"), the defendants JAVAUGHN HORTON and ERIK STEADMAN did knowingly and intentionally assault inmate John Doe, an individual who is known to me, by striking, beating and wounding.

(Title 18, United States Code, Section 113(a)(4))

The source of your deponent's information and the grounds for her belief are as follows:¹

Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all relevant facts and circumstances of which I am aware.

- 1. I am a Special Agent with the United States Attorney's Office for the Eastern District of New York and have been involved in the investigation of numerous cases involving assaults, including assaults at the MDC. I am familiar with the facts and circumstances set forth below from, among other things, my participation in this investigation, my review of surveillance video and my review of the investigative file.
- 2. The MDC is an administrative security metropolitan detention center located in Brooklyn, New York. It primarily houses defendants detained prior to their trial on federal criminal charges filed in the United States District Court for the Eastern District of New York and the United States District Court for the Southern District of New York, although inmates from other districts may also be housed at the MDC for various reasons. Currently, approximately 1,200 defendants are incarcerated at the MDC.

I. The Defendant JAVAUGHN HORTON's Detention at the MDC

- 3. On or about December 12, 2023, a superseding indictment was filed in the Southern District of New York charging the defendant JAVAUGHN HORTON with conspiracy to commit Hobbs Act robbery and Hobbs Act robbery, in violation of 18 U.S.C. § 1951, possession and discharge of a firearm during a crime of violence, in violation of 18 U.S.C. § 924(c) and being a felon in possession of ammunition, in violation of 18 U.S.C. § 922(g)(1), in connection with a robbery on or about January 30, 2023 where the defendant was alleged to have shot the victim. See United States v. Horton, No. 23-CR-526, ECF No. 12 (JGLC) (S.D.N.Y). HORTON was ordered detained pending trial.
- 4. The Federal Bureau of Prisons ("BOP") designated HORTON to be detained at the MDC pending trial.

5. On May 9, 2024, HORTON pled guilty to being a felon in possession of ammunition, in violation of 18 U.S.C. § 922(g)(1). See United States v. Horton, No. 23-CR-526, ECF No. 38 (JGLC) (S.D.N.Y). On August 14, 2024, HORTON was sentenced to 70 months' imprisonment.

II. The Defendant ERIK STEADMAN's Detention at the MDC

- 6. On or about November 9, 2023, a grand jury sitting in the Southern District of New York returned a 34-count superseding indictment charging, among others, the defendant ERIK STEADMAN with participation in a racketeering conspiracy, in violation of 18 U.S.C. § 1962(d); two counts of assault with a dangerous weapon and attempted murder in-aid-of racketeering, in violation of 18 U.S.C. § 1959(a)(3), two counts of discharging a firearm in connection with a crime of violence, in violation of 18 U.S.C. § 924(c), narcotics trafficking in violation of 21 U.S.C. § 846 and possession of a firearm in connection with a drug trafficking offense, in violation of 18 U.S.C. § 924(c); all related to STEADMAN's membership in "Young Gunnaz" a violent drug trafficking organization operating in Poughkeepsie and Newburgh, New York. See United States v. Sampson, et al, 22-CR-640, ECF No. 90 (S.D.N.Y.).
- 7. The Federal Bureau of Prisons ("BOP") designated STEADMAN to be detained at the MDC pending trial.

III. The September 5, 2024 Assault at the MDC

8. As depicted in video surveillance footage, on the evening of September 5, 2024, at approximately 8:43 p.m., HORTON and STEADMAN were in the common area of their unit. HORTON and STEADMAN approached an inmate whose identity is known to me (the "Victim") and attacked him. As reflected in the video surveillance video, the attack began when HORTON struck the Victim in the face using a slashing motion that is consistent with slashing with a sharp weapon. As the Victim tried to back away, HORTON and STEADMAN pushed

him into a table and continued to punch and strike his face. See Fig. 1 (a screenshot from the security camera footage).



Figure 1

- 9. HORTON and STEADMAN then pushed the Victim into a wall and continuing striking him. Once the Victim fell to the ground, HORTON and STEADMAN continued punching and kicking him in the face. In response, a correctional officer who observed HORTON and STEADMAN assaulting the Victim, approached and ordered the defendants to stop fighting. As reflected in the video surveillance video, as additional employees and staff arrived in response to the altercation, HORTON and STEADMAN quickly left the area and fled to the top tier of the unit.
- 10. As reported by MDC correctional officers and reflected in the surveillance video, MDC staff located HORTON and STEADMAN on the top tier of the unit, placed them both in hand restraints and escorted them to a special housing unit.

11. As a result of the assault, the Victim suffered, among other things, a significant, 13-centimeter laceration to his face, requiring him to be taken to a hospital for treatment.

WHEREFORE, your deponent respectfully requests that warrants issue for the arrests of the defendants JAVAUGHN HORTON and ERIK STEADMAN so that they may be dealt with according to law.

/s/ Danielle Williams
DANIELLE WILLIAMS
Special Agent

Sworn to before me by telephone this 28th day of February, 2025

Robert Levy
THE HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK